

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KIMBERLY CURTIS,

Plaintiff,

-against-

HILTON WORLDWIDE HOLDINGS INC.,  
HILTON GARDEN INN NEW YORK/CENTRAL  
PARK, HILTON GARDEN INNS  
MANAGEMENT LLC, MOINIAN LLC, THE  
MOINIAN DEVELOPMENT GROUP LLC, 237  
WEST 54<sup>TH</sup> STREET LLC, PAV-LAK  
CONTRACTING INC., and KOTA DRYWALL  
CORP.,

Defendants.

18-cv-3068 (ER)

**VERDICT FORM**

Hilton Worldwide Holdings Inc., Hilton Garden Inn New York/Central Park, Hilton Garden Inns Management LLC, Moinian LLC, the Moinian Development Group LLC, 237 West 54<sup>th</sup> Street LLC are collectively referred to herein as “the Hotel Defendants.”

**QUESTION 1:**

**PART ONE**

Has Mrs. Curtis proven by a preponderance of the evidence that the Hotel Defendants negligently allowed a bathroom door condition to exist that was not reasonably safe at the time of the accident?

YES ☒

NO ☐

**PART TWO—answer Part Two only if you answered yes to Part One**

Has Mrs. Curtis proven by a preponderance of the evidence that the Hotel Defendants’ negligence was a substantial factor in bringing about her injuries?

YES ☒

NO ☐

*If you answered “yes” to Parts One and Two, please continue to Question 2.*

*If you answered “no” to either Part One or Part Two, your deliberations are complete. The foreperson should sign the last page of the verdict sheet.*

**QUESTION 2:**

State the amount you award, if any, for Mrs. Curtis' past pain and suffering from the incident on September 4, 2015 to today. If you do not award any damages, write "none."

\$ 250,000.00

**QUESTION 3:**

State separately the amount you award, if any, for the following items of damages that Mrs. Curtis is likely to incur and/or suffer in the future. If you award damages, also state the period of years over which such is intended to provide compensation. If you do not award any damages as to any item, write "none."

Medical Expenses	\$ <u>830,262.00</u> +	<u>27.5</u> years
Rehabilitation Services	\$ <u>45,410.00</u> +	<u>27.5</u> years
Pain and Suffering	\$ <u>1,000,000.00</u> +	<u>27.5</u> years

**QUESTION 4:****PART ONE**

Has Mrs. Curtis proven by a preponderance of the evidence that the Hotel Defendants acted wantonly and recklessly?

YES ✓ NO       

**PART TWO—*answer Part Two only if you answered yes to Part One***

What amount, if any, do you award in punitive damages as to the Hotel Defendants?

\$ 30 million

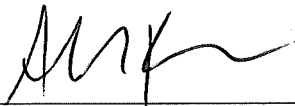
**QUESTION 5:**

Have the Hotel Defendants proven by a preponderance of the evidence that they are entitled to a contractual indemnification from Pav-Lak Contracting, Inc.?

YES \_\_\_\_\_

NO ✓

**Your deliberations are complete, and you have reached a verdict. The foreperson should sign below.**

 Alice Kim  
Signature of Foreperson

Dated: May 6, 2024